UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Criminal No.: 19-10080-NMG

MOTION FOR RULE 11 HEARING

The government respectfully moves for a hearing pursuant to Federal Rule of Criminal Procedure 11. As grounds for this motion, the government states that the defendant has indicated, though her counsel, that she wishes to plea guilty to Count One of the Fourth Superseding Indictment insofar as it charges conspiracy to commit mail and wire fraud, in violation of Title 18, United States Code, Section 1349.

The defendant's counsel has advised the government that the defendant, who resides in California and Nevada, requests that the hearing be conducted by Zoom. The government has no objection to this request.

Respectfully submitted,

NATHANIEL R. MENDELL Acting United States Attorney

By: /s/ Justin D. O'Connell

JUSTIN D. O'CONNELL

KRISTEN A. KEARNEY

LESLIE A. WRIGHT

STEPHEN E. FRANK

IAN J. STEARNS

Assistant United States Attorneys

Date: August 12, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

/s/ Justin D. O'Connell
JUSTIN D. O'CONNELL
Assistant United States Attorney